

The Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STARK, *et al.*

Plaintiffs,

v.

THE SEATTLE SEAHAWKS, FOOTBALL,
NORTHWEST, LLC, *et al.*,

Defendants.

Case No. CV06-1719 JLR

SUPPELEMENTAL DECLARATION
PAUL A. AINSWORTH IN SUPPORT
OF THE SEAHAWKS DEFENDANTS'
MOTION FOR LEAVE TO FILE
A MOTION FOR SUMMARY
JUDGMENT WITHIN 90 DAYS OF
THE TRIAL DATE

I, Paul A. Ainsworth, declare as follows:

1. I am an attorney admitted to practice *pro hac vice* in the United States District Court for the Western District of Washington. I am associated with the firm of Covington & Burling LLP. My firm represents defendants the Seattle Seahawks, Football Northwest, LLC, and First & Goal, Inc. in the above-captioned matter.

2. I am familiar with the matters set forth herein and make this declaration on personal knowledge and belief.

SUPPLEMENTAL DECLARATION OF PAUL A.
AINSWORTH IN SUPPORT OF THE SEAHAWKS
DEFENDANTS' MOTION FOR LEAVE TO FILE A
MOTION FOR SUMMARY JUDGMENT WITHIN 90
DAYS OF THE TRIAL DATE

COVINGTON & BURLING LLP
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WASHINGTON, DC 20002
TEL: 202.662.6000 FAX: 202.662.6291

Case No. CV06-1719 JLR

3. I am the principal point of contact for communications with plaintiffs' counsel and also with counsel for the co-defendants in this case, the Washington Public Stadium Authority and Lorraine Hine.

4. On March 20, 2007, we received plaintiffs' responses to the Seahawks Defendants First Set of Requests for Production of Documents and also to the Seahawks Defendants First Set of Interrogatories.

5. Two weeks later, on April 3, 2007, I participated in a conference call with counsel for all the parties during which we discussed discovery matters. During that call, I requested that plaintiffs' counsel identify dates when Mr. and Mrs. Stark would be available for deposition. We did not receive a response to this request from plaintiffs' counsel until six days later, on April 9, 2007. Over the course of the following several days, I corresponded with plaintiffs counsel regarding the scheduling of depositions of all witnesses to be deposed in this matter. On April 13, 2007, the parties agreed to a comprehensive deposition schedule to take the depositions of eleven witnesses. Those depositions occurred over a two week period starting on April 23, 2007, and were held in Seattle, Minnesota, New York City, and Washington D.C.

I declare under penalty of perjury that the foregoing is true and correct.



Paul A. Ainsworth

Executed on: May 21, 2007

CERTIFICATE OF SERVICE

I HEREBY certify that on May 21, 2007, I electronically filed the foregoing using the ECM/CMF system which will send notification of the filing to Timothy G. Leyh, Esq. and Christopher T. Wion, Esq. of Danielson Harrigan Leyh & Tollefson LLP, 999 Third Avenue, Suite 4400, Seattle, WA 98104, Counsel for Plaintiffs, and John J. Dunbar of Ball Janik LLP, 101 Southwest Main Street, Suite 1100, Portland, OR 9720, Counsel for Defendants the Washington State Public Stadium Authority and Lorraine Hine, in her official capacity as Chairperson of the Washington State Public Stadium Authority board of directors.



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